

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Comcast of Southern New England, Inc.) **Case No.: 1:05-cv-11413-PBS**

Plaintiff,)

vs.)

Magda Siotas)

Defendant)

**PLAINTIFF'S THIRD MOTION TO
EXTEND TIME TO MOVE FOR
DEFAULT JUDGMENT**

NOW COMES the Plaintiff in the above-captioned case and respectfully requests that this Court extend the deadline for the Plaintiff to move for default judgment to April 21, 2006.

As grounds, the Plaintiff states:

1. In addition to the grounds set forth in its prior Motions, which still pertain, the Plaintiff seeks additional time to make further attempts at settlement negotiations with the Defendant.
2. The additional time is necessary because the Defendant has told Plaintiff's Counsel she has been ill was to be admitted to a hospital on March 22, 2006. Plaintiff's Counsel only learned of this information on March 21 when he was finally contacted by the Defendant.
3. It is still the intent of the Plaintiff to file for Default Judgment if this case cannot be resolved in the near future.

Respectfully Submitted for the Plaintiff,
Comcast of Southern New England, Inc.
By Its Attorney

3/23/06
Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
Green, Miles, Lipton & Fitz-Gibbon LLP
77 Pleasant Street
P.O. Box 210
Northampton, MA 01061-0210
(413) 586-0865

CERTIFICATE OF SERVICE

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 23rd day of March 2006, a copy of the foregoing motion and affidavit were sent via first class mail to:

Magda Siotas
12 Astor Street
Lowell, MA 01852

/s/ John M. McLaughlin
John M. McLaughlin

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Comcast of Southern New England, Inc.)	Case No.: 1:05-cv-11413-PBS
)	
Plaintiff)	AFFIDAVIT OF ATTORNEY IN
)	SUPPORT OF PLAINTIFF'S THIRD
vs.)	MOTION TO EXTEND TIME TO MOVE
)	FOR DEFAULT JUDGMENT
Magda Siotas)	
)	
Defendant)	

Now comes John M. McLaughlin, Attorney for the Plaintiff in the above-entitled action, and, on oath, states the following:

1. I am still making an attempt to negotiate a settlement with the Defendant.
2. After my last motion for extension, I was expecting to hear back from the Defendant.
3. Despite numerous phone calls, I did not hear from the Defendant until March 21, 2006, at which time she informed me that she had been ill.
4. The Defendant has also told me that she was to be admitted to Lowell Hospital on March 21, 2006.
5. The Defendant does not expect to be in the hospital for an extended stay. In fact, she has told me that she will contact me next week with an individual who is more conversant in English than the Defendant.
6. It is still the intent of the Plaintiff to file for Default Judgment if this case cannot be resolved in the near future.

Subscribed and sworn to, under the pains and penalties of perjury.

Respectfully Submitted for the Plaintiff,
Comcast of Southern New England, Inc.
By Its Attorney,

3/23/2006

Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
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